

1 Presented to the Court by the foreman of the  
2 Grand Jury in open Court, in the presence of  
3 the Grand Jury and FILED in the U.S.  
4 DISTRICT COURT at Seattle, Washington.

5  
6 April 23 2025  
7 Kavi Subramanian, Clerk  
8 By Am J. Smith Deputy  
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12 UNITED STATES DISTRICT COURT FOR THE  
13 WESTERN DISTRICT OF WASHINGTON  
14 AT SEATTLE  
15  
16

17 UNITED STATES OF AMERICA,

18 Plaintiff

19 v.

20 1. MARQUIS JACKSON,  
21 2. MARKELL JACKSON,  
22 3. MANDEL JACKSON,  
23 4. EDGAR VALDEZ,  
24 5. KEONDRE JACKSON,  
25 6. MICHAEL YOUNG,  
1. SIR TERRIQUE MILAM,  
2. TYRELL LEWIS,  
3. ROBERT JOHNSON,  
4. MATELITA JACKSON,  
5. MIRACLE PATU-JACKSON,  
6. DIYANA ABRAHA,  
7. ROBERT BELLAIR,  
8. RONALD FINKBONNER,  
9. PATRICK JAMES,  
10. CHAD CONTI,  
11. PHILLIP LAMONT ALEXANDER,  
12. TREYVON MITCHELL, and  
13. DEJAUN RANSAW.

14 Defendants.

15 NO. CR24-164 JNW

16 **SECOND SUPERSEDING INDICTMENT**

1 The Grand Jury charges that:

2 **COUNT 1**

3 **(Conspiracy to Distribute Controlled Substances)**

4 Beginning at a time unknown, and continuing until at least October 2, 2024, in  
 5 King, Pierce, Snohomish, and Whatcom Counties, within the Western District of  
 6 Washington, and elsewhere, MARQUIS JACKSON, MARKELL JACKSON, MANDEL  
 7 JACKSON, EDGAR VALDEZ, KEONDRE JACKSON, MICHAEL YOUNG, SIR  
 8 TERRIQUE MILAM, TYRELL LEWIS, ROBERT JOHNSON, MATELITA  
 9 JACKSON, MIRACLE PATU-JACKSON, DIYANA ABRAHA, ROBERT BELLAIR,  
 10 RONALD FINKBONNER, PATRICK JAMES, CHAD CONTI, PHILLIP LAMONT  
 11 ALEXANDER, TREYVON MITCHELL, DEJAUN RANSOW, and others known and  
 12 unknown, did knowingly and intentionally conspire to distribute controlled substances,  
 13 including: N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), N-(4-  
 14 fluorophenyl)-N-[1-(2-phenylethyl)-4-piperidinyl]propanamide (p-fluorofentanyl – a  
 15 fentanyl analogue), methamphetamine, and marihuana, substances controlled under  
 16 Title 21, United States Code.

17 The Grand Jury further alleges that with respect to MARQUIS JACKSON,  
 18 MARKELL JACKSON, MANDEL JACKSON, EDGAR VALDEZ, KEONDRE  
 19 JACKSON, MICHAEL YOUNG, SIR TERRIQUE MILAM, TYRELL LEWIS,  
 20 ROBERT JOHNSON, MATELITA JACKSON, MIRACLE PATU-JACKSON,  
 21 DIYANA ABRAHA, ROBERT BELLAIR, RONALD FINKBONNER, PATRICK  
 22 JAMES, CHAD CONTI, PHILLIP LAMONT ALEXANDER, TREYVON MITCHELL,  
 23 and DEJAUN RANSOW, their conduct as members of the conspiracy charged in  
 24 Count 1, which includes the reasonably foreseeable conduct of other members of the  
 25 conspiracy charged in Count 1, involved 400 grams or more of a mixture or substance  
 26 containing fentanyl, in violation of Title 21, United States Code, Sections 841(b)(1)(A).

1 The Grand Jury further alleges that with respect to MARQUIS JACKSON,  
2 MARKELL JACKSON, MANDEL JACKSON, EDGAR VALDEZ, KEONDRE  
3 JACKSON, MICHAEL YOUNG, SIR TERRIQUE MILAM, TYRELL LEWIS,  
4 ROBERT JOHNSON, MATELITA JACKSON, MIRACLE PATU-JACKSON,  
5 DIYANA ABRAHA, ROBERT BELLAIR, RONALD FINKBONNER, PATRICK  
6 JAMES, CHAD CONTI, PHILLIP LAMONT ALEXANDER, TREYVON MITCHELL,  
7 and DEJAUN RANSAW, their conduct as members of the conspiracy charged in  
8 Count 1, which includes the reasonably foreseeable conduct of other members of the  
9 conspiracy charged in Count 1, involved 100 grams or more of a mixture and substance  
10 containing a detectable amount of any fentanyl analogue, in violation of Title 21, United  
11 States Code, Sections 841(b)(1)(A).

12 The Grand Jury further alleges that with respect to EDGAR VALDEZ, their  
13 conduct as members of the conspiracy charged in Count 1, which includes the reasonably  
14 foreseeable conduct of other members of the conspiracy charged in Count 1, involved 50  
15 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, and 500  
16 grams or more of a mixture or substance containing a detectable amount of  
17 methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21,  
18 United States Code, Sections 841(b)(1)(A).

19 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A),  
20 841(b)(1)(D), and 846.

## COUNT 2

## **(Conspiracy to Commit Money Laundering)**

## A. The Conspiracy

24 Beginning at a time unknown, and continuing until at least October 2, 2024, in  
25 King, Pierce, Snohomish, and Whatcom Counties, within the Western District of  
26 Washington, and elsewhere. MARQUIS JACKSON, MARKELL JACKSON,

1 MATELITA JACKSON, DIYANA ABRAHA, and others known and unknown, did  
 2 knowingly combine, conspire, and agree with each other and with other persons known  
 3 and unknown to the Grand Jury to commit offenses against the United States in violation  
 4 of Title 18, United States Code, Section 1956, to wit:

5       1. To knowingly conduct and attempt to conduct financial transactions  
 6 affecting interstate commerce and foreign commerce, which transactions involved the  
 7 proceeds of specified unlawful activity, that is, Conspiracy to Distribute Controlled  
 8 Substances as charged in Count 1, knowing that the transactions were designed in whole  
 9 or in part to conceal and disguise the nature, location, source, ownership, and control of  
 10 the proceeds of specified unlawful activity, and that while conducting and attempting to  
 11 conduct such financial transactions, knew that the property involved in the financial  
 12 transactions represented the proceeds of some form of unlawful activity, in violation of  
 13 Title 18, United States Code, Section 1956(a)(1)(B)(i); and

14       2. To knowingly conduct and attempt to conduct financial transactions  
 15 affecting interstate commerce and foreign commerce, which transactions involved the  
 16 proceeds of specified unlawful activity, that is, Conspiracy to Distribute Controlled  
 17 Substances as charged in Count 1, knowing that the transactions were designed in whole  
 18 or in part to avoid a transaction reporting requirement under State or Federal Law, and  
 19 that while conducting and attempting to conduct such financial transactions, knew that  
 20 the property involved in the financial transactions represented the proceeds of some form  
 21 of unlawful activity, in violation of Title 18, United States Code, Section  
 22 1956(a)(1)(B)(ii).

23           All in violation of Title 18, United States Code, Section 1956(h).

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## **COUNT 3**

## (Distribution of a Controlled Substance)

On or about October 31, 2023, in Snohomish County, within the Western District of Washington, and elsewhere, MARKELL JACKSON, and others known and unknown, did knowingly and intentionally distribute, and aid and abet the distribution of, a controlled substance, including: fentanyl and p-fluorofentanyl (a fentanyl analogue), substances controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 400 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that the offense involved 100 grams or more of a mixture and substance containing a detectable amount of any fentanyl analogue.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

## COUNT 4

## **(Distribution of a Controlled Substance)**

On or about December 7, 2023, in Snohomish County, within the Western District of Washington, and elsewhere, MARKELL JACKSON, and others known and unknown, did knowingly and intentionally distribute, and aid and abet the distribution of, a controlled substance, including: fentanyl, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 400 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

## COUNT 5

### **(Distribution of a Controlled Substance)**

8 On or about March 7, 2024, in Snohomish County, within the Western District of  
9 Washington, and elsewhere, MARKELL JACKSON, ROBERT JOHNSON, and others  
10 known and unknown, did knowingly and intentionally distribute, and aid and abet the  
11 distribution of, a controlled substance, including: fentanyl, a substance controlled under  
12 Title 21, United States Code.

13 The Grand Jury further alleges that the offense involved 400 grams or more of a  
14 mixture or substance containing fentanyl.

15 The Grand Jury further alleges that this offense was committed during and in  
16 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled  
17 Substances).

18 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
19 841(b)(1)(C), and Title 18, United States Code, Section 2.

## COUNT 6

## **(Possession with Intent to Distribute a Controlled Substance)**

22 On or about December 7, 2023, in Whatcom County, within the Western District  
23 of Washington, and elsewhere, ROBERT BELLAIR, MARKELL JACKSON, and others  
24 known and known, did knowingly and intentionally possess, and aid and abet the  
25 possession of, with the intent to distribute, a controlled substance, including: fentanyl, a  
26 substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 400 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

## COUNT 7

## **(Possession with Intent to Distribute a Controlled Substance)**

On or about February 9, 2023, in Whatcom County, within the Western District of Washington, and elsewhere, RONALD FINKBONNER did knowingly and intentionally possess, with the intent to distribute, a controlled substance, including: fentanyl and methamphetamine, substances controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 40 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and 841(b)(1)(C).

## COUNT 8

## **(Possession with Intent to Distribute a Controlled Substance)**

On or about July 22, 2024, in Whatcom County, within the Western District of Washington, and elsewhere, RONALD FINKBONNER did knowingly and intentionally possess, with the intent to distribute, a controlled substance, including: fentanyl and methamphetamine, substances controlled under Title 21, United States Code.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances):

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

## COUNT 9

## **(Possession with Intent to Distribute a Controlled Substance)**

8 On or about August 21, 2024, in Whatcom County, within the Western District of  
9 Washington, and elsewhere, PATRICK JAMES did knowingly and intentionally possess,  
10 and aid and abet the possession of, with the intent to distribute, a controlled substance,  
11 including: fentanyl, a substance controlled under Title 21, United States Code.

12 The Grand Jury further alleges that the offense involved 40 grams or more of a  
13 mixture or substance containing fentanyl.

14 The Grand Jury further alleges that this offense was committed during and in  
15 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled  
16 Substances).

17 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
18 841(b)(1)(B) and Title 18, United States Code, Section 2.

## **COUNT 10 - RESERVED**

## COUNT 11

## **(Possession with Intent to Distribute a Controlled Substance)**

22 On or about October 2, 2024, in King County, within the Western District of  
23 Washington, and elsewhere, CHAD CONTI did knowingly and intentionally possess,  
24 with the intent to distribute, a controlled substance, including: fentanyl and  
25 p-fluorofentanyl (a fentanyl analogue), substances controlled under Title 21, United  
26 States Code.

The Grand Jury further alleges that the offense involved 40 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

## COUNT 12

## **(Possession with Intent to Distribute a Controlled Substance)**

On or about October 2, 2024, in Whatcom County, within the Western District of Washington, and elsewhere, PHILLIP LAMONT ALEXANDER did knowingly and intentionally possess, with the intent to distribute, a controlled substance, including: fentanyl, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 40 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

## COUNT 13

## (Possession with Intent to Manufacture and Distribute a Controlled Substance)

On or about October 2, 2024, in King County, within the Western District of Washington, and elsewhere, MANDEL JACKSON, DEJAUN RANSAW, and others known and unknown, did knowingly and intentionally manufacture and possess, with the intent to distribute, and aid and abet the manufacture and possession of, with intent to

1 distribute, a controlled substance, including: marijuana, a substance controlled under  
 2 Title 21, United States Code.

3 The Grand Jury further alleges that this offense was committed during and in  
 4 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled  
 5 Substances).

6 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
 7 841(b)(1)(D).

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9 **FORFEITURE ALLEGATION**

10 The allegations contained in Counts 1 through 9 and 11 through 13 of this  
 11 Indictment are hereby realleged and incorporated by reference for the purpose of alleging  
 12 forfeiture.

13 Upon conviction of any of the offenses alleged in Counts 1, 3 through 9, and 11  
 14 through 13, MARQUIS JACKSON, MARKELL JACKSON, MANDEL JACKSON,  
 15 EDGAR VALDEZ, KEONDRE JACKSON, MICHAEL YOUNG, SIR TERRIQUE  
 16 MILAM, TYRELL LEWIS, ROBERT JOHNSON, MATELITA JACKSON, MIRACLE  
 17 PATU-JACKSON, DIYANA ABRAHA, ROBERT BELLAIR, RONALD  
 18 FINKBONNER, PATRICK JAMES, CHAD CONTI, PHILLIP LAMONT  
 19 ALEXANDER, TREYVON MITCHELL, and DEJAUN RANSAW shall forfeit to the  
 20 United States, pursuant to Title 21, United States Code, Section 853(a), any property  
 21 constituting or derived from proceeds traceable to the offense, as well as any property  
 22 used or intended to be used to facilitate the offense.

23 Upon conviction of the offense alleged in Count 2, MARQUIS JACKSON,  
 24 MARKELL JACKSON, MATELITA JACKSON, and DIYANA ABRAHA, shall forfeit  
 25 to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any

1 property, real or personal, involved in the offense, or any property traceable to such  
2 property.

3 **Substitute Assets.** If any of the above-described forfeitable property, as a result of  
4 any act or omission of the defendants,

5 a. cannot be located upon the exercise of due diligence;  
6 b. has been transferred or sold to, or deposited with, a third party;  
7 c. has been placed beyond the jurisdiction of the Court;  
8 d. has been substantially diminished in value; or  
9 e. has been commingled with other property which cannot be divided  
10 without difficulty,

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1 it is the intent of the United States to seek the forfeiture of any other property of the  
2 defendant, up to the value of the above-described forfeitable property, pursuant to  
3 Title 21, United States Code, Section 853(p).

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5 A TRUE BILL:

6 DATED: 4/23/2025

7 *Signature of Foreperson redacted pursuant*  
8 *to the policy of the Judicial Conference of*  
9 *the United States.*

10 FOREPERSON

11   
12 TEAL LUTHY MILLER  
13 Acting United States Attorney

14   
15 VINCENT T. LOMBARDI  
16 Assistant United States Attorney

17   
18 ZACHARY W. DILLON  
19 Assistant United States Attorney

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